IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) DAVID M. JONES, a.k.a. "DAVO," [DOB: 02-20-1993],

(2) NATHANIEL FINNEY, a.k.a. "NATE," [DOB: 12-13-1988],

(3) JASON LUMPKIN, a.k.a. "LUMP," [DOB: 07-01-1987],

(4) VINCENT T. JACKSON, a.k.a. "SQUEAK," [DOB: 09-17-1990],

(5) JOSHUA T. FLUKER, a.k.a. "JIZZLE," [DOB: 10-21-1992],

(6) STEFFON RAINEY, a.k.a. "CHEESE" and "MONEY," [DOB: 04-24-1992],

(7) REGGIE MCDOWELL, a.k.a. "DIME," [DOB: 04-06-1997],

(8) SHANE MITCHELL, a.k.a. "BIGGZ," [DOB: 03-01-1995],

(9) ISAAC J. WILSON, a.k.a. "HOTHEAD" and "MECES," [DOB: 05-13-1995],

and

Case No.

COUNT 1

Conspiracy to Distribute 500 Grams or More of Methamphetamine
21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846
NLT 10 Years' Imprisonment
NMT Life Imprisonment
NMT \$10,000,000 fine
NLT 5 Years' Supervised Release
Class A Felony

COUNTS 2-3, 5-7, 9, 11-22, 24, & 26

Distribution of Methamphetamine, Fentanyl, and Cocaine
21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years' Imprisonment
NMT \$1,000,000 Fine
NLT 3 Years' Supervised Release
Class C Felony

COUNTS 4, 8, 10, 23, & 25

Possession of a Firearm in Furtherance of a Drug Trafficking Offense
18 U.S.C. § 924(c)(1)(A)(i)
NLT 5 Years' Imprisonment
(Consecutive to Any Other Sentences)
NMT Life Imprisonment
NMT \$250,000 Fine
NMT 5 Years' Supervised Release
Class A Felony

FORFEITURE ALLEGATION

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

(10) DEIONTE E. WILLIAMS, a.k.a. "TAE" and "LOCC,"

[DOB: 02-05-1993],

Defendants.

INDICTMENT

THE GRAND JURY CHARGES THAT:

DEFENDANT	Counts
(1) David M, Jones	1, 16, 18, and FA
(2) Nathaniel Finney	1, 20, 24–25, and FA
(3) Jason Lumpkin	1 and FA
(4) Vincent T. Jackson	1, 11, 15, and FA
(5) Joshua T. Fluker	1, 14, and FA
(6) Steffon Rainey	1, 2, 26, and FA
(7) Reggie McDowell	1, 3–10, 12, and FA
(8) Shane Mitchell	1, 21–23, and FA
(9) Isaac J. Wilson	1, 13–14, 17, and FA
(10) Deionte E. Williams	1, 19, and FA

COUNT ONE

Beginning on an unknown date, but no later than on or about January 1, 2016, and continuing through the date of this indictment, in Jackson County, within the Western District of Missouri, and elsewhere, the defendants, DAVID M. JONES, a.k.a. "DAVO," NATHANIEL FINNEY, a.k.a. "NATE," JASON LUMPKIN, a.k.a. "LUMP," VINCENT T. JACKSON, a.k.a. "SQUEAK," JOSHUA T. FLUKER, a.k.a. "JIZZLE," STEFFON RAINEY, a.k.a. "CHEESE" and "MONEY," REGGIE MCDOWELL, a.k.a. "DIME," SHANE MITCHELL, a.k.a. "BIGGZ," ISAAC J. WILSON, a.k.a. "HOTHEAD" and "MECES," and DEIONTE E. WILLIAMS, a.k.a. "TAE" and "LOCC," knowingly and intentionally conspired and agreed with one another and others, both known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine,

a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about January 26, 2021, in Jackson County, in the Western District of Missouri, the defendant, **STEFFON RAINEY**, **a.k.a.** "CHEESE" and "MONEY," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT THREE

On or about February 23, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FOUR

On or about February 23, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL, a.k.a. "DIME,"** knowingly possessed a firearm, to wit, a .357-caliber handgun, in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count One, and distribution of any amount of methamphetamine, as charged in Count Three, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

On or about March 3, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL, a.k.a.** "**DIME,**" knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SIX

On or about April 20, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVEN

On or about July 8, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHT

On or about July 8, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly possessed a firearm in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count One, and distribution of any amount

of methamphetamine, as charged in Count Seven, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT NINE

On or about November 2, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TEN

On or about November 2, 2021, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly possessed a firearm in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count One, and distribution of any amount of methamphetamine, as charged in Count Nine, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT ELEVEN

On or about December 8, 2021, in Jackson County, in the Western District of Missouri, the defendant, VINCENT T. JACKSON, a.k.a. "SQUEAK," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWELVE

On or about February 23, 2022, in Jackson County, in the Western District of Missouri, the defendant, **REGGIE MCDOWELL**, **a.k.a.** "**DIME**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT THIRTEEN

On or about February 23, 2022, in Jackson County, in the Western District of Missouri, the defendant, **ISAAC J. WILSON, a.k.a. "HOTHEAD" and "MECES,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FOURTEEN

On or about March 24, 2022, in Jackson County, in the Western District of Missouri, the defendants, **JOSHUA T. FLUKER**, **a.k.a.** "**JIZZLE**," and **ISAAC J. WILSON**, **a.k.a.** "**HOTHEAD**" and "**MECES**," did aid and abet and knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C); and 18 U.S.C. § 2.

COUNT FIFTEEN

On or about March 24, 2022, in Jackson County, in the Western District of Missouri, the defendant, VINCENT T. JACKSON, a.k.a. "SQUEAK," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SIXTEEN

On or about March 29, 2022, in Jackson County, in the Western District of Missouri, the defendant, **DAVID M. JONES, a.k.a. "DAVO,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVENTEEN

On or about April 4, 2022, in Jackson County, in the Western District of Missouri, the defendant, **ISAAC J. WILSON, a.k.a. "HOTHEAD" and "MECES,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHTEEN

On or about April 4, 2022, in Jackson County, in the Western District of Missouri, the defendant, **DAVID M. JONES, a.k.a. "DAVO,"** knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide ("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT NINETEEN

On or about June 8, 2022, in Jackson County, in the Western District of Missouri, the defendant, **DEIONTE E. WILLIAMS, a.k.a.** "TAE" and "LOCC," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY

On or about June 8, 2022, in Jackson County, in the Western District of Missouri, the defendant, **NATHANIEL FINNEY**, **a.k.a.** "**NATE**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-ONE

On or about June 8, 2022, in Jackson County, in the Western District of Missouri, the defendant, **SHANE MITCHELL**, **a.k.a.** "**BIGGZ**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide ("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-TWO

On or about June 15, 2022, in Jackson County, in the Western District of Missouri, the defendant, **SHANE MITCHELL**, **a.k.a.** "**BIGGZ**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide

("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-THREE

On or about June 15, 2022, in Jackson County, in the Western District of Missouri, the defendant, **SHANE MITCHELL**, **a.k.a.** "**BIGGZ**," knowingly possessed a firearm in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count One, and distribution of any amount of cocaine and fentanyl, as charged in Count Twenty-Two in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWENTY-FOUR

On or about June 15, 2022, in Jackson County, in the Western District of Missouri, the defendant, **NATHANIEL FINNEY**, **a.k.a.** "**NATE**," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWENTY-FIVE

On or about June 15, 2022, in Jackson County, in the Western District of Missouri, the defendant, **NATHANIEL FINNEY**, **a.k.a.** "**NATE**," knowingly possessed a firearm in furtherance of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count One, and distribution of any amount of methamphetamine, as charged in Count Twenty-Four, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TWENTY-SIX

On or about June 16, 2022, in Jackson County, in the Western District of Missouri, the defendant, **STEFFON RAINEY**, **a.k.a.** "CHEESE" and "MONEY," knowingly and intentionally distributed any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

- 1. The allegations contained in Count One of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. Upon conviction of the controlled substance offense alleged in Count One of this Indictment, the defendants, DAVID M. JONES, a.k.a. "DAVO," NATHANIEL FINNEY, a.k.a. "NATE," JASON LUMPKIN, a.k.a. "LUMP," VINCENT T. JACKSON, a.k.a. "SQUEAK," JOSHUA T. FLUKER, a.k.a. "JIZZLE," STEFFON RAINEY, a.k.a. "CHEESE" and "MONEY," REGGIE MCDOWELL, a.k.a. "DIME," SHANE MITCHELL, a.k.a. "BIGGZ," ISAAC J. WILSON, a.k.a. "HOTHEAD" and "MECES," and DEIONTE E. WILLIAMS, a.k.a. "TAE" and "LOCC," shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count One of this Indictment, including, but not limited to the following: a money judgment in the amount of proceeds obtained directly and indirectly as a result of the defendants' participation in the drug conspiracy alleged in Count One.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

	/s/ Sharon Williams
	FOREPERSON OF THE GRAND JURY
/s/ Byron H. Black	
BYRON H. BLACK	DATED: <u>6/21/2022</u>
Assistant United States Attorney	Kansas City, Missouri

/s/ Stephanie C. Bradshaw
STEPHANIE C. BRADSHAW
Special Assistant United States Attorney